UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL LEAGUE PLAYERS' CONCUSSION INJURY LITIGATION No. 12-md-2323 (AB)

MDL No. 2323

THIS DOCUMENT RELATES TO:

Plaintiffs' Master Administrative Long-Form Complaint and:

Robert Massey, et al. v. National Football League, et al.

Court File No. 2:12-cv-6069-AB

MOTION FOR LEAVE TO
WITHDRAW AS COUNSEL
FOR PLAINTIFFS TONY CASILLAS
AND TAMARA CASILLAS

Charles S. Zimmerman, J. Gordon Rudd, Jr., and Brian C. Gudmundson of Zimmerman Reed LLP ("Plaintiffs' Counsel"), move this Court pursuant to Pennsylvania Rule of Professional Conduct 1.16(b)(1) and United States District Court for the Eastern District of Pennsylvania Local Rule of Civil Procedure 5.1(c) to withdraw as counsel in relation to the claims of Tony Casillas and Tamara Casillas only in this action, and state as follows:

- 1. Plaintiffs' counsel filed the action *Robert Massey, et al. v. National Football League, et al.*, No. 2:12-cv-6069-AB, in the Eastern District of Pennsylvania on September 27, 2012, for the benefit of several retired National Football League players, including Tony Casillas and Tamara Casillas.
- 2. Plaintiffs' counsel filed a short form complaint for Tony Casillas and Tamara Casillas on October 29, 2012.

3. Since then, irreconcilable differences have arisen between Plaintiffs Tony Casillas and Tamara Casillas and the undersigned.

4. Plaintiffs' counsel properly notified Tony Casillas and Tamara Casillas of

counsel's intention to withdraw from representing them in this matter.

5. Under the circumstances, it is apparent that the undersigned must move the

Court for leave to withdraw as counsel.

WHEREFORE, Plaintiffs' counsel respectfully requests this Court for leave to

withdraw as counsel for Tony Casillas and Tamara Casillas only in Court File No. 2:12-

cv-6069-AB.

Dated: March 10, 2017

Respectfully submitted,

ZIMMERMAN REED LLP

s/ Charles S. Zimmerman

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